

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IMMIGRANT DEFENSE PROJECT,  
HISPANIC INTEREST COALITION  
OF ALABAMA, and the CENTER FOR  
CONSTITUTIONAL RIGHTS,

Plaintiffs,

v.

UNITED STATES IMMIGRATION  
AND CUSTOMS ENFORCEMENT and  
UNITED STATES DEPARTMENT OF  
HOMELAND SECURITY,

Defendants.

No. 14 Civ. 6117 (JPO)

**STIPULATION AND ORDER MODIFYING FOIA REQUEST**

WHEREAS, on October 17, 2013, plaintiffs Immigrant Defense Project, Hispanic Interest Coalition of Alabama, and The Center For Constitutional Rights (“Plaintiffs”) made a request (the “Request”) pursuant to the Freedom of Information Act (“FOIA”), to United States Immigration and Customs Enforcement (“ICE”) and the United States Department of Homeland Security (“DHS,” and together with ICE, “Defendants”);

WHEREAS, the Request sought various records relating to enforcement operations conducted by ICE and/or DHS;

WHEREAS, by stipulation (the “Stipulation”) dated July 28, 2017, which was so-ordered by the Court on July 31, 2017, ECF No. 74, the parties modified the original Request by, inter alia, replacing the Defendants’ original search obligations with obligations under a Joint Proposal for New Searches (the “Joint Proposal”), attached as an exhibit to the Stipulation;

WHEREAS, the parties now wish to make further modifications to Defendants' obligations under the Request by modifying the Joint Proposal;

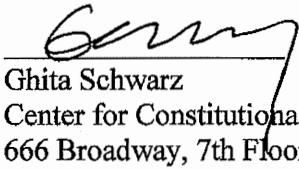
NOW, THEREFORE, it is hereby STIPULATED and AGREED between the Parties as follows:

1. The first bullet point beneath paragraph B.5 of the Joint Proposal is hereby struck.
2. A new paragraph 7 is added to part B of the Joint Proposal, as follows: "7. The New York City HSI and ERO field offices will search for all non-public policies, protocols, or trainings regarding courthouse arrests dating from January 20, 2017 to May 1, 2018." ICE represents that some documents responsive to this paragraph exist.
3. The New York City ERO field office will conduct supplemental searches, including at a minimum for emails, operation plans, and daily operation reports, for the operations listed in the second, third, and fourth bullet points of paragraph B.5 of the original Joint Proposal. Except as modified by paragraph 2 of this stipulation, the scope of ICE's search obligations under paragraphs B.5 and B.6 of the Joint Proposal remain unchanged.
4. Any documents responsive to the supplemental searches described in paragraphs 2 and 3 of this stipulation will be processed pursuant to the FOIA by July 13, 2018.

5. In all other respects, the Joint Proposal and Stipulation remain in effect without alteration.

Date: New York, New York  
June 14, 2018

GHITA SCHWARZ

  
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*Attorney for Plaintiffs*

The parties shall submit a joint status letter on or before August 3, 2018.

SO ORDERED:

  
J. PAUL OETKEN  
United States District Judge

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United States Attorney for the  
Southern District of New York

  
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Dated: June 18, 2018